

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

**UNITED STATES DEPARTMENT OF
AGRICULTURE,**

Plaintiff,

v.

MARY MARSTON,

Defendant,

CASE NO. 2:25-cv-00205-SDN

RESPONSE TO ORDER TO SHOW

NOW COMES the United States Department of Agriculture (the “Plaintiff”), by and through its undersigned Counsel and responds to the Court’s Order to Show Cause [Dkt. 13] (the “Show Cause Order”) as follows:

1. On April 29, 2025, the Plaintiff filed a complaint for foreclosure and order of sale against Mary Marston (the “Defendant”) respecting the real property located at or about at 1002 Peabody Road, Appleton ME 04862. (the “Property”).
2. The Plaintiff respectfully requests that the court stay proceedings to allow the Defendant time to explore potential resolution options regarding the mortgage loan at issue in this foreclosure action. Specifically, Plaintiff agreed at mediation to allow Defendant 60 days to explore the potential of a short sale to her daughter and son-in-law before requesting the case be returned to the U.S. District Court Docket.
3. Plaintiff believes that a temporary stay would be appropriate and sufficient to supporting the parties’ efforts to reach a mutually satisfactory resolution.

WHEREFORE, Plaintiff respectfully requests the court issue a temporary stay of proceedings; and grant any further relief the court deems just and appropriate.

Dated this October 21, 2025.

/s/ Kevin J. Crosman

Kevin J. Crosman, Bar No. 4279

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2025, I caused a copy of the foregoing to be served by way of the ECF system, which will send notice of such filing to all counsel of record.

The following parties were notified by First Class Mail, Postage Pre-Paid:

Mary M. Marston
1002 Peabody Road
Appleton, ME 04862

Dated at Portland, Maine, this October 21, 2025.

/s/ Kevin J. Crosman

Kevin J. Crosman, Bar No. 4279

Attorney for Plaintiff